

AEP Ohio

Muskingum River Plant 1501 Sparling Road Waterford, OH 45786-6104 AEPOhio.com

March 9, 2012

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Joseph Solt Chemical Emergency Preparedness and Prevention Section U. S. Environmental Protection Agency – Region 5 77 West Jackson Boulevard (SC-5J) Chicago, Illinois 60604

Received

MAR 1 3 2012

Chemical Emergency Preparedness Program

RF:

AEP Muskingum River Plant

CERCLA Continuous Release Submission #522754

Dear Mr. Solt:

On February 27, 2012, the American Electric Power (AEP) Muskingum River Plant received a letter from U. S. EPA requesting confirmation of the information contained within the Comprehensive Environmental Response, Compensation and Liability Act continuous release report submitted by AEP for Muskingum River Plant on March 4, 2009.

This letter is to verify the accuracy of the information contained within the March 4, 2009 report except for one item. An amendment is required to be made to our Person in Charge: please remove Mr. David Wickline and insert Mr. Jeffrey Wiegand as Muskingum River's new Person in Charge.

If you have any questions, or require any additional information, please call Jim Ludwig at 740-984-3468.

Sincerely,

Ms f Wiegard

Jeffrey L. Wiegand

Plant Manager - Muskingum River Plant

Ohio Power Company

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Muskingum D:

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CERTIFIED MAIL Return Receipt Requested

March 4, 2009

U. S. EPA Region V Office of CEEP Chemical Preparedness 77 West Jackson Boulevard Chicago, Illinois 60604

Subject:

First Anniversary Follow-up Report -

MAY 1 5 2009

Muskingum River Plant

Received

MAY 1 5 2009

Chemical Emergency Preparedness Program

Dear Mr. Sandstrom:

This letter is submitted as the First Anniversary Follow-up Report to the notification made on February 7, 2008 at 3:25 p.m. ESI, by Mr. Joseph Campbell of Ohio Power Company, who, at that time notified the National Response Center (NRC) of a change in the normal range of continuous release of Sulfuric Acid, a reportable substance, from our Muskingum River Plant (CR-ERNS #522755 and #522754). The February 7, 2008 notification of change revised the normal range of emissions for Sulfuric Acid (CASRN # 7664939) from Unit 5 of the Muskingum River Plant. The range was revised to be from 2,097 to 17,799 pounds per 24-hour period for Unit 5. A written report was submitted on March 5, 2008.

These sulfuric acid emissions are routine in nature, anticipated, intermittent and incidental to the normal operation of the facility. Based upon these characteristics, these emissions are eligible for continuous release reporting. Actual releases will vary with seasonal operation of the equipment, actual hours of operation, fuel quality and other factors, but the released quantity will remain within these newly established ranges.

This First Anniversary Follow-up Report is a release information update in which no changes are being made to the detailed information previously submitted. Therefore, we are only revising the signed Section I to indicate the type of report.

Please find enclosed an original signed "First Anniversary Follow-up Report" (Section I) for Muskingum River Plant. Copies of the previously submitted Section II, (Source Information) for each emissions unit and Section III, calculation of the SSI (Upper Bound) for each reported substance are attached for your information.

If you have any questions concerning this notice, please do not hesitate to contact James D. Ludwig by telephone at (740) 984-3468 or by e-mail at jdludwig@aep com.

David D. Wickline General Plant Manager Muskingum River Plant

Enclosure

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 5227

522755 and 522754

Part C. Identify and Ouantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Markingum River Stack CS014

Usi each hazardous substance released from the source identified stoove and provide the following information, (For an example, see Table 1 of Reporting Requirements for Continuous Rolences of Hazardow Substances - A Guide for Facilities and Vessels on Compilance.)

	Months of the	Release	13	12	77	77	13	13	12	13.	13
Total Quantity	Released in Previous Year	the the section.	30,012,000	1,600,000	2,400,000	268,000	1,314,000	349	7,820	886	4,902
		(per year)	365								
Normal Range	geper day)*	Upper Bound Lower Bound	194,207	10,221	9,015	605	3,013	0.5	11.8	2.7	10.2
Norma	(In Ibs. ook	- Upper Bound	430,062	22,635	21,150	1,418	7,826	1.2	39.0	10.5	25.1
		CASRN#	10102439	10102440	7647010	7664393	7664939.	7439976	7446084	7778441	57125
		Name of Hazardous Substance	Nitrogen oxide	Mitrogen dioxide	Bydrochloric acid	Hydrogen fluoride	Bulfuzia acid	Mergury	Selenium dioxide	Calcium arsenate	Cyanidas

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Configurations Releases of Hazardous Substances - A Guide for Badlitles and Vessis on Configures.)

	Months	of the	Belguse
Total Quantity of	e Mixture Released	in Previous Year	(In Ibs. or kg)
		Ocours	
Mixture	(In the neko mer day)*	Upper. Lower	Bound Bound
Comments	in the orter par decide	Under 1,000er	Bound Bound
			Percentago
			CASRN#
Namen	Herebdone	Substance	Components
			Name of Mixiure

^{*} Please be sure to incivide unitar where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

SECTION II: SOURCE INFORMATION	CR-ERNS Number: 522755 and 522754							
Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary								
Name of Source: Muskingum River S	tack S							
I Indicate whether the release from this source is either: continuous without interruption OR	routine, anticipated, intermittent X							
 Identify the activity(ies) that results in the release from if malfimotion, describe the malfunction and explain wit continuous and stable in quantity and rate.* 	this source (e.g., batch process, filling of a storage tank) by the release from the malfunction should be considered							
The releases associated with this source result from the c for production of electricity	Scheme and form							
Calculations for releases of identified substances include circumstances that may be defined as malfunctions under meet the requirements for inclusion in 40 CFR Part 302 5 reference into 40 CFR Part 355 Emergency Planning and	r other state and federal regulatory programs but I Continuous Releases, and as incorporated by							
3. Identify below how you established the partern of relea	ese and calculated release estimates							
_X Past release data X Knowledge of the operations and :								
_X AP-42 X Best professional	l judgment Other (axplain)							
	·							
* Note that unanticipated events, such as spills, pipe ruptur do not qualify for reduced reporting under CERCLA section normal operations and by definition are not continuous or to be considered stable in quantity and rate	103(f)(2) Unanticipated events are not incidental to							

SECTION II: SOURCE 522755 anđ **INFORMATION** CR-ERNS Number: 522754 (continued) Name of Source: Muskingum River Stack 5 Part B: Specific Information on the Source For the source identified above, provide the following information. Please provide a SEPARAIE sheet for EACH source. Photocopy this page if necessary. AFFECTED MEDIUM. Identify the environmental medium (i.e., sir, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected. AIR _ (stack _ or area ___) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source If identified source is a stack, indicate stack height: 828 feet as stack; OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: _____ square feet or square meters O SURFACE WATER ____ (stream ____, lake ____, or other_ If the release affects any surface water body, give the name of the water body. If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: ____ or average flow rate: ___ cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters surface area of lake: ____ acres and average depth of lake: ____ meters. O SOIL OR GROUND WATER if the release is on or under ground, indicate the distance to the closest water well. Optional Information The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified. For a release to surface water, provide the For a stack release to air, provide the following following information, if available: information, if available: _ feet/second Average Velocity _ Inside diameter feet or meters of Surface Water Gas Exit Velocity __ __feet/second or meters/second degrees Fahrenheit. Cas Temperature ____ Kelvin or Celsius

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 5

522755 and : 522754

Part C. Identity and Onantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Muskingum River. Stack 5

List each hazardous substance released from the source identified above and provide the following information. (Nor an example, see Table 1 of Reporting Requirements for Continuous Reseases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

		Norma	Normal Range	Number of Days	Total Ouantity	
		(in Ibs. or i	tg por day)*	Release Occurs	Released in Previous Year	Months of the
Name of Hazardous Substance	CASRN#	Upper Bound Lower Bounc	Lower Bound	(her year)	(in lbs. or kg)"	Release
Nitrogen oxide	10102439	127,717	126,507	365	23,400,000	12
Nitrogen dioxide	10102440	6,722	3,775	365	1,200,000	12
Hydrochloric acid	7647010	13,655	6,692	365	3,400,000	12
Bydrogen Fluoride	7664393	916	449	365	221,000	. 21
Bulfuric acid	7664939	17,799	2,097	365	348,367	12
Selenium dioxide	7446084	25.1	8.7	365	6,630	12
Calcium arsenate	7778441	11.5	2.2	365	728	12
Cyanides	57125	14.1	8.3	365	3,902	27
Mercury	7439976	0.7	0.3	365	153	12.

List each nuxture released from the source identified above and provide the following information. (For an example, see Table T of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Naclifites and Vesseis on Compliance.)

Release Months ofthe Number of Total Quantity of Days Release Mixture Released Ocours in Previous Year (in lbs. or kg) Total Quantity of (in lbs. or kg.per day)*
Upper Lower
Bound Bound Normal Range of Mixture (in lbs. or kg per day)*
Upper Lower
Bound Bound Normal-Range of Components Weight Percentage CASRN# Substance Components Hazardous Name of Name of Mixture

^{*} Please de sure to urande units where appropriate. Also, if the release is a radionuclide, units of curies (A) are appropriatio,

CR-ERNS Number:

522755 522754

bas

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen oxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., karer Gir)

Muskingum River Stack CS014

430,062

Muskingum River Stack 5

127,717

TOTAL - SSI tt igger for this hazardous substance release*: ____557

CR-ERNS Number:

522755

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, he certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., keres Gil

Muskingum River Stack CS014

22,635

Muskingum River Stack 5

6,722

TOTAL - SSI trigger for this hazardous substance release*:

29,357

CR-ERNS Number:

522755 522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrochloric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Minskingum River Stack CS014

21,150

Muskingum River Stack 5

13,655

TOTAL - SSI trigger for this hazardous substance release*:

CR-ERNS Number:

522755 522754

and .

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardons Substance:

Hydrogen fluoride

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., ke-co-ct)

Muskingum River Stack CS014

1,418

Muskingum River Stack 5

916

TOTAL - SSI trigger for this hazardous substance release*:

2,334

CR-ERNS Number:

522755 and 522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardons Substance:

Sulfuric acid

To calculate the SSI trigger (i e, the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kg. or Ci)

Muskingum River Stack CS014

7,826

Muskingum River Stack 5

17,799

TOTAL - SSI trigger for this hazardous substance release*: 25,625

^{*}This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754

and....

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Mercury

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., ke-was Gi)

Muskingum River Stack C5014

1.2

Muskingum River Stack 5

0.7

TOTAL - SSI trigger for this hazardous substance release*: 1.

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

salenium dioxida

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II., Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II. Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., ke-ar-Gi)

Muskingum River Stack CS014

39 0

Muskingom River Stack 5

25.1

TOTAL - SSI trigger for this hazardous substance release*: 64.1

CR-ERNS Number:

522755 522754

5 and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

calcium arsenate

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the bazardous substance identified above, aggregate the upper bounds of the normal range of the identified bazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Mnskingum River Stack CS014

10.5

Muskingum River Stack 5

11.5

CR-ERNS Number: 522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

cyanides

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the bazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II. Part C, in your calculation of the SSI trigger:

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs_skscoos@)

Muskingum River Stack CS014

25.1

Mnskingum River Stack 5

14.1

TOTAL - SSI trigger for this hazardous substance release* : _

cc w/att:

Ohio Environmental Protection Agency Attn: State Emergency Response Commission 122 South Front Street Columbus, OH 43215

LEPC Miranda Mullen Morgan Cnty. EMA Director 60 South Fourth St. McConnelsville, OH 43756

LEPC Jeff Lauer Washington Cnty. LEPC 205 Putnam St. Marietta, OH 45750

Beverly Volunteer Fire Department 204 Fifth Street Beverly, OH 45715

Ohio Environmental Protection Agency Attn: Mr. Dean Ponchak 2195 Front Street Logan, OH 43138

CERTIFIED MAIL RETURN RECEIPT REQUESTED

David Wickline Muskingum River Unit Nos. 1,2,3,4 and 5 Rural Route # 2 Waterford, Ohio 47586

Re: Continuous Release Submission #522754

Dear Mr. Wickline:

The U.S. Environmental Protection Agency (EPA) Region 5 is currently investigating the source, extent, and nature of releases of hazardous substances at your facility. In the past, your facility submitted a continuous release report under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). For your convenience, enclosed with this letter is a copy of your latest continuous release submission. Pursuant to the authority of Section 104(e) of the CERCLA, 42 U.S.C. § 9604(e), you are hereby requested to verify the information submitted in the enclosed continuous release report. Compliance with this information request is mandatory.

CERCLA Section 103(f)(2) and the federal regulations published at Title 40 of the Code of Federal Regulations, Sections 302.8 and 355.40 (40 CFR §§ 302.8 and 355.40) allow reduced reporting requirements for releases of hazardous substances that are "continuous" and "stable in quantity and rate." Please note, however, that CERCLA Section 103(f)(2) and 40 CFR §§ 302.8 and 355.40 require that persons or entities that choose these reduced reporting requirements by filing continuous release reports are further required to notify EPA of statistically significant increases in the release, as well as changes in the source or composition, normal range, or any other information reported in the submitted continuous release reports. A copy of the regulations at 40 CFR §§ 302.8 and 355.40 are attached for your reference.

Your written response verifying the information in your continuous release report is due within 20 days of receipt of this letter. Please send your response to:

Joseph Solt
Chemical Emergency Preparedness
and Prevention Section
U.S. EPA – Region 5
77 West Jackson Boulevard (SC-5J)
Chicago, Illinois 60604

If you have any questions or concerns regarding this letter please contact Ruth McNamara of my staff at (312) 353-3193. For questions regarding a new or revised continuous release submission contact Joe Solt (312) 353-4583.

Sincerely,

Michael E. Hans, Chief Chemical Emergency Preparedness and Prevention Section

Enclosures: Submitted Continuous Release Information Regulations at 40 CFR §§ 302.8 and 355.40

WH 113



A unit of American Electric Power

AEP Ohio

Muskingum River Plant 1501 Sparling Road Waterford, OH 45786-6104

Extended CR-ECNS CERTIFIED MAIL

Processed Fite

Return Receipt Requested

March 5, 2008

U. S. EPA Region 5 Superfund Division 77 West Jackson Boulevard Mail Code S-6J Chicago, Illinois 60604

Attention: Mr. Richard Karl, Director

RECEIVED

APR 1 6 2008

Office of Common Preparedness and Prevention

Subject:

Written Notification of a Change in the Normal Range of Continuous Releases -

Muskingum River Plant

Dear Mr. Karl:

On February 7, 2008 at 3:25 p.m. EST, Mr. Joseph Campbell of Ohio Power Company notified the National Response Center (NRC) of a change in the normal range of continuous release of Sulfuric Acid, a reportable substance, from our Muskingum River Plant (CR-ERNS #522755 and #522754). The call to the NRC was assigned incident report #861783.

The previously reported range for the continuous release of sulfuric acid within a 24-hour period from the Muskingum River Plant Stack No. 5 was 361 to 1053 pounds. The new normal range of emissions for the continuous release of Sulfuric Acid (CASRN # 7664939) for Unit 5 should now be listed as 2,097 to 17,799 pounds per 24-hour period. The expected ranges previously reported for the continuous release of sulfuric acid emissions from the Muskingum River Stack CS014 are unchanged.

These sulfuric acid emissions are routine in nature, anticipated, intermittent and incidental to the normal operation of the facility. Based upon these characteristics, these emissions are eligible for continuous release reporting. Actual releases will vary with seasonal operation of the equipment, actual hours of operation, fuel quality and other factors, but the released quantity will remain within these newly established ranges.

The change in the normal range of sulfuric acid emissions was the result of a re-evaluation of the calculations used to estimate the emissions and the installation and operation of an air emission control system at Muskingum River Plant. The normal range for other substances previously reported as a continuous release will not change for the Muskingum River Plant.

Enclosed are the revised forms for the Muskingum River Plant. Specifically, we are providing a revised Section I, (General Information), Section II, (Source Information) for each emissions unit and Section III, calculation of the SSI (Upper Bound) for each reported substance.

If you have any questions concerning this notice, please do not hesitate to contact James D. Ludwig by telephone at (740) 984-3468 or by e-mail at jdludwig@aep.com.

Sincerely,

Mark C. Studenic

General Plant Manager

Mark C. Studenic

Muskingum River Plant

Enclosure

MCS:JDL:clb

cc w/att:

Ohio Environmental Protection Agency Attn: State Emergency Response Commission 122 South Front Street Columbus, OH 43215

LEPC Miranda Mullen Morgan Cnty. EMA Director 60 South Fourth St. McConnelsville, OH 43756

LEPC Jeff Lauer Washington Cnty. LEPC 205 Putnam St. Marietta, OH 45750

Beverly Vol. Fire Department Fifth Street Beverly, OH 45715 Attn: Fire Chief

Lowell-Adams Vol. Fire Department Lock Street Lowell, OH 45744 Attn: Fire Chief

Ohio Environmental Protection Agency Attn: Mr. Dean Ponchak 2195 Front Street Logan, OH 43138

SECTION 1	I: GENERAL INFORMATION	522755 and 522754 CR-ERNS Number: 522754					
Date of In	itial Release:	Date of Initial Call to NRC: 03/13/00					
	eport: Indicate below the type of report First Anniversa Follow-up Report						
quantity and ra	ate under the definitions in 40 CFR 302.8 current to the best of my knowledge.	ubstances releases described herein are continuous and stable in 8(a) or 355 4(a)(2)(iii) and that all submitted information is Mark Studenic, Plant Manager Name and Position					
MARC	2H 05, 2008	Mark C Studenic Signature					
Part A. Facility or Vessel Information							
Name of Fac	ility or Vessel Muskingum R	River Unit Nos. 1, 2, 3, and 4; and River Unit No. 5					
Person in Charge Name of Person in Charge Mark Studenic							
of Facility							
Facility Address or Street Rural Route No. 2 - Box 310 County Morgan & Washington							
						Vessel Port of	tof City Waterford State OH Zip Code 45786
Registration Dun and Bradstreet Number for Facility 063765341							
Facility/Vessel Latitude Deg 039 Min 35 Sec 25 Vessel LORAN Coordinates Location Deg 081 Min 40 Sec 46							
Part B. Population Information							
Population Density	Choose the range that describes the pop (Indicate by placing an "X" in the appro 0 - 50 persons 51 - 100 persons						
Sensitive Populations	Sensitive Populations or F (e.g., schools, hospitals, wetlands, w	· 1					
and Ecosystems Within One Mile Radius	State listed endangere threatened species						

SECTION II: SOURCE INFORMATION

to be considered stable in quantity and rate

CR-ERNS Number:

522755 522754

and

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

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n OR ro	outine, anticipated, intermittent X	
his source result from the combt	astion of fossil fuels to produce steam energ	Ŋ
fined as malfunctions under other lusion in 40 CFR Part 302.8 Cor	er state and federal regulatory programs but ntinuous Releases, and as incorporated by	
blished the pattern of release a	nd calculated release estimates.	
·	•	estimate
X Best professional judg	gment Other (expla	uin)
	his source result from the combination and substances include periodical as malfunctions under other lusion in 40 CFR Part 302.8 Corps Emergency Planning and Not blished the pattern of release asX Knowledge of the fac operations and release	his source result from the combustion of fossil fuels to produce steam energe lentified substances include periods of startup and shutdown and certain fined as malfunctions under other state and federal regulatory programs but lusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by Emergency Planning and Notification. X Knowledge of the facility/vessel's X Engineering experiments and release history

do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular

SECTION II: SOURCE **INFORMATION**

CR-ERNS Number:

522755 522754 and

(coi	ntinued)
Name of Source:	Muski
art B: Specific Ir	formation
For the source idea	

ngum River Stack CS014

n on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected

If identified source is a stack, indicate stack height: _828 feet or receive OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters. SURFACE WATER (stream, lake, or other) If the release affects any surface water body, give the name of the water body. If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: acres and average depth of lake: meters.		IR X (stackX or area) If the medium affected is air, please also specify whether the ource is a stack or a ground-based area source.
If the release affects any surface water body, give the name of the water body If the release affects a stream, give the stream order or average flow rate, in cubic feet per second stream order: or average flow rate: cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.	,	If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive
stream order: or average flow rate: cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.		
		stream order: or average flow rate: cubic feet/second; OR
	,	· · · · · · · · · · · · · · · · · · ·

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified

For a stack release	to air, provide the following
information, if ava	
Inside diameter	feet or meters
Gas Exit Velocity	feet/second or
•	meters/second
Gas Temperature	degrees Fahrenheit.
	Kalvin or Colsins

For a release to su following informa	rface water, provide the tion, if available:
_	feet/second

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522755 and 522754

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Muskingum River Stack CS014

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Keporting Requirements for Continuous Releases of Mazardous Substances - A Guide for Facilities and Vessels on Comphance.)	onnunous Ker	eases of Mazardou	s Substances - A	Cuide for Facilities	and vessels on Compilance.)	
		Norm	Normal Range	Number of Days	1	2:0
		(in lbs. ox	(in lbs. oxylogoper day)*	Release Occurs	Year	Months of the
Name of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in lbs. occupation	Release
Nitrogen oxide	10102439	430,062	194,207	365	30,012,000	12
Nitrogen dioxide	10102440	22,635	10,221	365	1,600,000	12
Hydrochloric acid	7647010	21,150	9,015	365	2,400,000	12
Hydrogen fluoride	7664393	1,418	605	365	268,000	. 12
Sulfuric acid	7664939.	7,826	3,013	365	1,314,000	12
Mercury	7439976	1.2	0.5	365	349	12
Selenium dioxide	7446084	39.0	11.8	365	7,820	12
Calcium arsenate	7778441	10.5	2.7	365	886	12.
Cyanides	57125	25.1	10.2	365	4,902	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

		Months	of the	Release
	iotal Quantity of	Mixture Released	in Previous Year	(in ibs. or kg)
	Number of	Days Release	Occurs	(per year)
NOTIFIED NAMES OF	Mixture	(in lbs. or kg per day)*	Upper Lower	Bound Bound
Noi lital Kange of	Components	(in lbs. or kg per day)*	Weight Upper Lower	Percentage Bound Bound
				CASRN#
	Name of	Hazardous	Substance	Components
				Name of Mixture

^{*} Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

SECTION II: SOURCE INFORMATION

to be considered stable in quantity and rate.

CR-ERNS Number:

522755 522754

and

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary

Name of Source:	Muskingum River Stack 5	
l. Indicate whether the rele	ease from this source is either:	······································
continuous without intern	ruptionOR routine, anticipate	ed, intermittent X
If malfunction, describe continuous and stable in	with this source result from the combustion of fossil fu	e malfunction should be considere
circumstances that may	s of identified substances include periods of startup and be defined as malfunctions under other state and federa for inclusion in 40 CFR Part 302.8 Continuous Releases	al regulatory programs but
reference into 40 CFR I	Part 355 Emergency Planning and Notification	,
reference into 40 CFR I	Part 355 Emergency Planning and Notification	
reference into 40 CFR I	Part 355 Emergency Planning and Notification	
reference into 40 CFR I	Part 355 Emergency Planning and Notification u established the pattern of release and calculated rel	
reference into 40 CFR I	Part 355 Emergency Planning and Notification u established the pattern of release and calculated rel X Knowledge of the facility/vessel's	ease estimates
3. Identify below how yo X. Past release date	e established the pattern of release and calculated rel X Knowledge of the facility/vessel's operations and release history	ease estimatesX Engineering estimate
3. Identify below how yo X. Past release date	e established the pattern of release and calculated rel X Knowledge of the facility/vessel's operations and release history	ease estimatesX Engineering estimate

do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and by definition are not continuous or anticipated and are not sufficiently predictable or regular

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522755 522754

and

Name of Source:

Muskingum River Stack 5

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

	AIR _x_ (stack _x_ or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.
i	If identified source is a stack, indicate stack height: 828 feet or never (OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive
	emissions), indicate surface area: square feet or square meters
Ø	SURFACE WATER (stream, lake, or other)
,	If the release affects any surface water body, give the name of the water body.
	If the release affects a stream, give the stream order or average flow rate, in cubic feet per second stream order: or average flow rate: cubic feet/second; OR
,	If the release affects a lake, give the surface area of the lake in acres and the average depth in meters surface area of lake: acres and average depth of lake: meters.
i	SOIL OR GROUND WATER the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release information, if ava	e to air, provide the following tilable:
Inside diameter	feet or meters
Gas Exit Velocity	feet/second or
	meters/second
Gas Temperature	degrees Fahrenheit.
• ~	Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity ______ feet/second of Surface Water

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

and 522755 522754

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Muskingum River Stack Name of Source:

11,70 oten List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Normal Range

		Norma	Normal Range	Number of Days	\	112
		(in Ibs. or k	(in lbs. or kg per day)*	Release Occurs	Released in Previous Year	Months of the
Name of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in lbs. or kg)*	Release
Nitrogen oxide	10102439	127,717	126,507	365	23,400,000	12
Nitrogen dioxide	10102440	6,722	3,775	365	1,200,000	12
Hydrochloric acid	7647010	13,655	6,692	365	3,400,000	12
Hydrogen Fluoride	7664393	916	449	365	221,000	12
Sulfuric acid	7664939	17,799	2,0,97	365	348,367	12
Selenium dioxide	7446084	25.1	8.7	365	6,630	12
Calcium arsenate	7778441	11,5	2.2	365	728	12
Cyanides	57125	14.1	8.3.	365	3,902	12
Mercury	7439976	0.7	0.3	365	153	12.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

		Months	of the	Release
,	Total Quantity of	Days Release Mixture Released	in Previous Year	(in Ibs. or kg)
	Number of	Days Releas	Occurs	(per year)
Normal Kange of	Mixture	(in lbs. or kg per day)*	Upper Lower	Bound Bound
Normal Range of	Components	(in lbs. or kg per day)*	Weight Upper Lower	e)
			×	CASRN# Per
	Name of	Hazardous	Substance	Components
		•	,	Name of Mixture

^{*} Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate,

CR-ERNS Number:

522755

and 522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen oxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgxsx &i)

Muskingum River Stack CS014

430,062

Muskingum River Stack 5

127,717

TOTAL - SSI trigger for this hazardous substance release*:

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

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Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgx &x (Six)

Muskingum River Stack CS014

22,635

Muskingum River Stack 5

6,722

TOTAL - SSI trigger for this hazardous substance release*:

CR-ERNS Number:

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522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrochloric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., xkspxcox&i)

Muskingum River Stack CS014

21,150

Muskingum River Stack 5

13,655

TOTAL - SSI trigger for this hazardous substance release*:

CR-ERNS Number:

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and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrogen fluoride

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kexxxxXi)

Muskingum River Stack CS014

1,418

Muskingum River Stack 5

916

TOTAL - SSI trigger for this hazardous substance release*: ___2

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

522755

and

CR-ERNS Number: 522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Sulfuric acid

To calculate the SSI trigger (i e, the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

<u>Upper Bound of the Normal Range of</u> the Release (specify lbs., kg, or Ci)

Muskingum River Stack CS014

7,826

Muskingum River Stack 5

17,799

TOTAL - SSI trigger for this hazardous substance release*: 25,625

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754 and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Mercury

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgxxxx Gi)

Muskingum River Stack CS014

1.2

Muskingum River Stack 5

0.7

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

sèlenium dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Rangé of the Release (specify lbs., kerof Gi)

Muskingum River Stack CS014

39.0

Muskingum River Stack 5

25.1

TOTAL - SSI trigger for this hazardous substance release* : 64.1

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

calcium arsenate

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., **specify)

Muskingum River Stack CS014

10.5

Muskingum River Stack 5

11.5

TOTAL - SSI trigger for this hazardous substance release*: 22

CR-ERNS Number: 522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

cyanides

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., keroon&x)

Muskingum River Stack CS014

25.1

Muskingum River Stack 5

14.1

TOTAL - SSI trigger for this hazardous substance release*:

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.



fldr-NRC@COMDT.USCG.MI

То

02/07/2008 02:41 PM

Subject NRC#861783

NATIONAL RESPONSE CENTER 1-800-424-8802

GOVERNMENT USE ONLYGOVERNMENT USE ONLY***

Information released to a third party shall comply with any applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 861783

INCIDENT DESCRIPTION

*Report taken by: CIV ABAYOMI SNOWDEN at 15:27 on 07-FEB-08

Incident Type: CONTINUOUS
Incident Cause: OTHER

Affected Area:

The incident occurred on 07-FEB-08 at 12:00 local time.

Affected Medium: AIR

REPORTING PARTY

Name:

JOE CAMPBELL

Organization: AEP

AEP

Address:

1501 SPARLING RD.

WATERFORD, OH 45786

AEP called for the responsible party.

PRIMARY Phone: (740) 9843463

Type of Organization: PRIVATE ENTERPRISE

SUSPECTED RESPONSIBLE PARTY

Name:

JOE CAMPBELL

Organization:

AEP

Address:

1501 SPARLING RD. WATERFORD, OH 45786

PRIMARY Phone: (740)9843463

(9843763

INCIDENT LOCATION

1501 SPARLING RD.

County: WASHINGTON

City: WATERFORD

State: OH Zip: 45786

RELEASED MATERIAL(S)

CHRIS Code: SFA

Official Material Name: SULFURIC ACID

Also Known As:

Qty Released: 0 UNKNOWN AMOUNT

DESCRIPTION OF INCIDENT

CALLER IS REPORTING A CONTINUOS RELEASE. CALLER SAYS THEY WILL RUN THERE S.C.R (SELECTIVE CATALYST REDUCTION) ALL YEAR AROUND. RESULTING IN A INCREASE OF SULFURIC ACID YEARLY. THEY ARE EXCEEDING THEY UPPER RANGE OF WHAT THEY PREVIOUSLY REPORTED IN THE YEAR 200. THE CALLERS C.A.S.R.N NUMBER IS 7664939.

SENSITIVE INFORMATION

INCIDENT DETAILS

Building ID:

Type of Fixed Object: POWER PLANT Power Generating Facility: YES

Generating Capacity: 620 Type of Fuel: NATURAL

NPDES:

NPDES Compliance: UNKNOWN

Continuous Release Type: STATISTICALLY SIGNIFICANT INCREASE

Initial Continuous Release Number: Continuous Release Permit: 522755

IMPACT

Fire Involved: NO Fire Extinguished: UNKNOWN

INJURIES: Hospitalized:

Empl/Crew: FATALITIES: NO Empl/Crew: Passenger: Passenger: Occupant:

EVACUATIONS: NO Who Evacuated: Radius/Area:

Damages: NO

Hours Direction of

Closure Type Description of Closure

Closed Closure

Ν

Air:

Major Artery: N

Road:

Ν

Waterway:

Track:

Environmental Impact: NO

Media Interest: NONE Community Impact due to Material:

REMEDIAL ACTIONS

NOTIFYING OF THE NEW WAY THAT THEY OPERATE THEIR UNIT

Release Secured: YES

Release Rate:

Estimated Release Duration:

WEATHER

ADDITIONAL AGENCIES NOTIFIED

Federal: NONE

State/Local: NONE

State/Local On Scene: NONE State Agency Number: NONE

NOTIFICATIONS BY NRC

ATLANTIC STRIKE TEAM (MAIN OFFICE)

07-FEB-08 15:41 (609)7240008

DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE)

07-FEB-08 15:41 (202)3661863

CONT. RELEASE ATTN: L. BEASLEY (MAIN OFFICE)

07-FEB-08 15:41 (703)6039086

CONT. RELEASE ATTN: B. SANDSTROM (MAIN OFFICE)

07-FEB-08 15:41 (312)8866028

U.S. EPA V (MAIN OFFICE)

(312) 3532318

NOAA RPTS FOR OH (MAIN OFFICE)

07-FEB-08 15:41 (206)5264911

NATIONAL RESPONSE CENTER HQ (MAIN OFFICE)

(202) 2671136

OHIO DEPARTMENT OF HEALTH (ATTN: LAURIE BLAKE)

07-FEB-08 15:41 (614)7528451

ORSANCO ATTN: J. SCHULTE (MAIN OFFICE)

07-FEB-08 15:41 (513)2317719

SECTOR OHIO VALLEY (COMMAND CENTER)

07-FEB-08 15:41 (502)7995422

OH EPA ATTN: DUTY OFFICER (MAIN OFFICE)

07-FEB-08 15:41 (614)2240946

WEST VIRGINIA DEP (MAIN OFFICE)

07-FEB-08 15:41 (304)5585938

WV DEP ATTN: DUTY OFFICER (MAIN OFFICE)

07-FEB-08 15:41 (800)6423074

WV DEP SPILL LINE (MAIN OFFICE)

07-FEB-08 15:41 (304)3683960

ADDITIONAL INFORMATION

CALLER HAS NO ADDITIONAL INFORMATION.

CONTINUOUS RELEASE MATERIAL

CHRIS Code: SFA

Official Material Name: SULFURIC ACID

Also Known As: Upper Bounds: /

*** END INCIDENT REPORT #861783 ***

Report any problems or Fax number changes by calling 1-800-424-8802 PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil



A unit of American Electric Power

OF III

AEP Ohio Muskingum River Plant 1501 Sparling Road Waterford, OH 45786-6104 AEPOhio.com

CERTIFIED MAIL
Return Receipt Requested

March 4, 2009 3 (5 9

U. S. EPA Region V
Office of CEEP Chemical Preparedness
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject:

First Anniversary Follow-up Report -

Muskingum River Plant

Dear Mr. Sandstrom:

This letter is submitted as the First Anniversary Follow-up Report to the notification made on February 7, 2008 at 3:25 p.m. EST, by Mr. Joseph Campbell of Ohio Power Company, who, at that time notified the National Response Center (NRC) of a change in the normal range of continuous release of Sulfuric Acid, a reportable substance, from our Muskingum River Plant (CR-ERNS #522755 and #522754). The February 7, 2008 notification of change revised the normal range of emissions for Sulfuric Acid (CASRN # 7664939) from Unit 5 of the Muskingum River Plant. The range was revised to be from 2,097 to 17,799 pounds per 24-hour period for Unit 5. A written report was submitted on March 5, 2008.

These sulfuric acid emissions are routine in nature, anticipated, intermittent and incidental to the normal operation of the facility. Based upon these characteristics, these emissions are eligible for continuous release reporting. Actual releases will vary with seasonal operation of the equipment, actual hours of operation, fuel quality and other factors, but the released quantity will remain within these newly established ranges.

This First Anniversary Follow-up Report is a release information update in which no changes are being made to the detailed information previously submitted. Therefore, we are only revising the signed Section I to indicate the type of report.

Please find enclosed an original signed "First Anniversary Follow-up Report" (Section I) for Muskingum River Plant. Copies of the previously submitted Section II, (Source Information) for each emissions unit and Section III, calculation of the SSI (Upper Bound) for each reported substance are attached for your information.

If you have any questions concerning this notice, please do not hesitate to contact James D. Ludwig by telephone at (740) 984-3468 or by e-mail at jdludwig@aep.com.

Sincerely,

David D. Wickline General Plant Manager Muskingum River Plant

Enclosure

SECTION	I: GENERAL INFORMATION	CR-ERNS Number: 522755 and 522754
Date of I	nitial Release;	Date of Initial Call to NRC: 03/13/00
	eport: Indicate below the type of report First Anniversary Follow-up Report	•
quantity and	ate under the definitions in 40 CFR 302.8(sourcent to the best of my knowledge.	estances releases described herein are continuous and stable in a) or 355.4(a)(2)(iii) and that all submitted information is avid Wickline, Plant Manager
-3/5/	12069 L	Name and Position
	ility or Vessel Information ility or Vessel Muskingum River Uni	t Nos. 1,2,3, and 4; and Muskingum River Unit No. 5
Person in Charge of Facility or Vessel	Name of Person in Charge David Wi Position Plant Manager Telephone No. (740) 984-2321	ckline Alternate Telephone No. ()
Facility Address or Vessel Port of Registration	Street Rural Route No. 2 - Box 31 City Waterford	County Morgan & Washington State OR Zip Code 45786
•		65341
Facility/Vess Location	el Latitude Deg 039 Min Longitude Deg 081 Min	
Part B. Por	ulation Information	
Population Density	Choose the range that describes the popular (Indicate by placing an "X" in the appropriate of the control of the second of the control of the	ation density within a one-mile radius of your facility or vessel fate blank below). 101 - 500 persons more than 1000 persons 501 - 1000 persons
Sensitive Populations and	Sensitive Populations or Ecc (e.g., schools, hospitals, wetlands, wild	
Ecosystems Within One Mile Radius	State Listed endangered and threatened	species Less than one mile at multiple locations

SECTION II: SOURCE INFORMATION	CR-ERNS Number: 522755 and 522754
Part A: Basis for Asserting the Release is Con For EACH source of a release of a hazardous subs vessel, provide the following information on a SEP necessary.	tance or mixture from your facility or
Name of Source: Muskingum River St	ack CS014
Indicate whether the release from this source is either: continuous without interruption OR	routine, amicipated, intermittentX
2. Identify the activity(ies) that results in the release from if malfunction, describe the malfunction and explain wh continuous and stable in quantity and rate.* The releases associated with this source result from the crior production of electricity. Calculations for releases of identified substances include circumstances that may be defined as malfunctions under meet the requirements for inclusion in 40 CFR Part 302.8 reference into 40 CFR Part 355 Emergency Planning and	periods of startup and shutdown and certain other state and federal regulatory programs but Continuous Releases, and as incorporated by
3 Identify below how you established the paneirs of release X Past release data X Knowledge of the operations and release.	Facility/vessel's X Engineering estimate
X AP-42 X Best professional	judgment Other (explain)

^{*} Note that unanticipated events, such as spills pipe ruptures, equipment failures, emergency shutdowns, or accidents do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and by definition are not continuous or anticipated and are not sufficiently predictable or regular to be considered stable in quantity and rate

CR-ERNS Number: INFORMATION 522754 (continued) Muskingum River Stack CS014 Name of Source: Part B: Specific Information on the Source For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary. AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected Ø AIR __X (stack X or area ___) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source. If identified source is a stack, indicate stack height: 828 feet occurrence OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: _____ square feet or square meters. O SURFACE WATER _____ (stream _____, lake _____, or other ____ If the release affects any surface water body, give the name of the water body If the release affects a stream, give the stream order or average flow rate, in cubic feet per second stream order: ____ or average flow rate: ____ cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: ____ acres and average depth of lake: ____ meters. O SOIL OR GROUND WATER If the release is on or under ground, indicate the distance to the closest water well. **Optional Information** The following information is not required in the final rule; however, such information will essist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified For a stack release to air, provide the following For a release to surface water, provide the information, if available: following information, if available: Average Velocity _____ feet/second Inside diameter ____ feet or meters of Surface Water Gas Exit Velocity _____ feet/second or meters/second

Gas Temperature _____ degrees Fahrenheit.

Kelvin or Celsius

522755

bns

SECTION II: SOURCE

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522755

and 522754

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Muskingum River Stack CS014

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compilance.)

1		Normal Range	Normal Range	Number of Days Release Occurs	Total Quantity	Months of the	
Nume of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in the godgo.	Release	
Nitrogen oxide	10102439	430,062	194,207		30,012,000	12	
Nitrogen dioxide	10102440	22,635	10,221		1,600,000	12	
Hydrodhloric acid	7647010	21,150	9,015		2,400,000	12	
Hydrogen fluoride	7664393	1,418	605		268,000	. 12	
Bulfuria acid	7664939.	7,826	3,013		1,314,000	12	
Mercury	7439976	7	0.5		349	12	
Selenium dioxide	7446084	39.0	11.8	365	7,820	1.2	
Calcium arsenate	777844I	10.5	2.7		886	13.	
Cyanides	57125	25.1	10.2		4,902	12	

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Mazardous Substances - A Guide for Facilities and Vessels on Compilance.)

Monthe	at contract	of the	Release
Total Quantity of	^		(In Ibs. or kg)
Number of	Days Keleas	Occurs	(per year)
Normal Range of Mixture	(in lbs. or kg per day)*	Upper Lower	Bound Bound
Normal Range of Components	in lbs. or kg per day)*	Upper Lower	Bound Bound
	•		Percentage
·	-		CASRN#
Name of	Hazairdous	Substance	Components
			Name of Mixture

^{*} Pleuse be sure 10 include units where appropriate. Also, if the releuse is a radionuclide, units of curtes (CI) are appropriate.

SECTION II: SOURCE INFORMATION

CR-ERNS Number:

522755

522754

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary

Name of Source:	Muskingum River Stack 5	<u> </u>
I Indicate whether the release	from this source is either:	
continuous without interrupti	onOR routine, anticipate	d, intermittent X
If malfunction, describe the continuous and stable in qua	this source result from the combustion of fossil fo	e malfunction should be considered
circumstances that may be di meet the requirements for in	identified substances include periods of startup and lefined as malfunctions under other state and federa aclusion in 40 CFR Part 302 8 Continuous Releases 355 Emergency Planning and Notification.	il regulatory programs but
	tabüshed the partern of release and calculated rel	ease estimates
		ease estimates X Engineering estimate
3. Identify below how you es	tabüshed the partern of release and calculated rel X Knowledge of the facility/vessel's	
Identify below how you est X Past release data	tablished the partern of release and calculated rel X Knowledge of the facility/vessel's operations and release history	X Engineering estimate

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents do not qualify for reduced reporting under CERCLA section 103(f)(2) Unanticipated events are not incidental to normal operations and by definition are not continuous or anticipated and are not sufficiently predictable or regular to be considered stable in quantity and rate

SECTION II: SOURCE INFORMATION (continued)	CR-ERNS Number: 522755 and 522754
Name of Source: Muskingum River Stack	5
Part B: Specific Information on the Source	
For the source identified above, provide the foll sheet for EACH source. Photocopy this page is	owing information. Please provide a SEPARATE f necessary.
AFFECTED MEDIUM. Identify the environmental med affected by the release from this source. If your source relewastepile releasing to air and ground water), treat the releasescition II, Parts A, B, and C, of this format for EACH me	seses hazardous substances to more than one medium (e.g., a se to EACH medium as a separate source and complete
AIR x (stack x or area) If the med source is a stack or a ground-based area source.	ium affected is air, please also specify whether the
If identified source is a stack, indicate stack her	· · · · · · · · · · · · · · · · · · ·
If identified source is an area source (e.g., waste emissions), indicate surface area: square	e pile, landfill, valves, tank vents, pump seals, fugitive feet or square meters
SURFACE WATER (stream, lake	or other
If the release affects any surface water body, g	
• -	arder or average flow rate, in cubic feet per second.
stream order: or average flow rate:	
	a of the lake in acres and the average depth in meters
surface area of lake: acres and average of	ispin of fake freets.
SOIL OR GROUND WATER If the release is on or under ground, indicate the distance	to the closest water well.
Optional I	nformation
evaluating the risks associated with the continuous t	of rule; however, such information will assist EPA in release. If this information is not provided, EPA will priate values. Please note that the units specified below ever, be certain that the units are clearly identified
For a stack release to air, provide the following information, if available: Inside diameter feet or meters Gas Evit Velocity feet/second or	For a release to surface water, provide the following information, if available: Average Velocity feet/second of Surface Water

Inside diameter _____ feet or meters Gas Exit Velocity _____ feet/second or

Gas Temperature ___

meters/second

degrees Fahrenheit. Kelvin or Celsius

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522755 and 522754

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Muskingum River Stack

Ŋ

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

•		Norma (in Ibs. or k	Normal Range (in 15s, or kg per-day)"	Number of Days Release Occurs	s Total Quantity Released in Provious Year	Months of the
Name of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in 15s. or kg)*	Release
Nitrogen oxide	10102439	127,717	126,507	365	23,400,000	
Nitrogen dloxide	10102440	6,722	3,775	365	1,200,000	12 .
Hydrochloric acid	7647010	13,655	6,692	365	3,400,000	12
Hydrogen Fluoride	7664393	916	449	365	221,000	12
Sulfuric acid	7664939	17,799	2,097	365	348,367	12
Selenium dloxide	7446084	25.1	8.7	365	6,630	12
Calcium arsenate	7778441	11.5	2.2	365	728	12
Cvanides	57125	14.1	8.3.	365	3,902	12
Mercury	7439976	0.7	0.3	365	153	12.

List each maxture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

	;	Months	of the	Reicase
	Number of Joral Quantity of	e Mixing Koloskod	in Previous Year	(in lbs. or kg)
	Number of	Days Releas	Occurs	(per year)
Normal Range of	Mixture	(in lbs. or kg.per day)*	Upper Lower	Bound Bound
Nonnal Range of	Components	(in Ibs. or kg per day)*	Upper Lower	Percentage Bound Bound
				CASRN#
	Name of	Hazardous	Substance	Components
				Name of Mixture

^{*} Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CL) are appropriate.

CR-ERNS Number:

522755 522754

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Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen oxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kg-ex-Gi)

Muskingum River Stack CS014

430,062

Muskingum River Stack 5

127,717

TOTAL - SSI trigger for this hazardous substance release*: ___557,77

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754

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Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen dicxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgxmxxii)

Muskingum River Stack CS014

22,635

Muskingum River Stack 5

6,722

TOTAL - SSI trigger for this hazardous substance release*:

29,357

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

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522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance

Hydrochloric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II. Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger:

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs. ske-coeci)

Muskingum River Stack CS014

21,150

Muskingum River Stack 5

13,655

TOTAL - SSI trigger for this hazardous substance release*:

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754

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Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrogen fluoride

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kexages)

Muskingum River Stack CS014

1,418

Muskingum River Stack 5

916

TOTAL - SSI trigger for this hazardous substance release*: ____2,3

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

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Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Sulfuric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kg, or Ci)

Muskingum River Stack CS014

7,826

Muskingum River Stack 5

17,799

TOTAL - SSI trigger for this hazardous substance release*: 25,625

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

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Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Mercury

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kexas (Ci)

Muskingum River Stack CS014

1.2

Muskingum River Stack 5

0.7

TOTAL - SSI trigger for this hazardous substance release*: 1.5

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

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Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

sèlenium dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C. in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Rangé of the Release (specify lbs., ke-or-Già

Muskingum River Stack CS014

39.0

Muskingum River Stack 5

25.1

TOTAL - SSI trigger for this hazardous substance release*: __64.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixiure occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

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522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

calcium arsenate

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs. ksporsci)

Muskingum River Stack CS014

10.5

Muskingum River Stack 5

11.5

TOTAL - SSI trigger for this hazardous substance release*: 22.0

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number: 522755

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

cyanides

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs...kspoods)

Muskingum River Stack CS014

25..1

Muskingum River Stack 5

14.1

TOTAL - SSI trigger for this hazardous substance release*:

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

cc w/att:

Ohio Environmental Protection Agency Attn: State Emergency Response Commission 122 South Front Street Columbus, OH 43215

LEPC Miranda Mullen Morgan Cnty. EMA Director 60 South Fourth St. McConnelsville, OH 43756

LEPC Jeff Lauer Washington Cnty. LEPC 205 Putnam St. Marietta, OH 45750

Beverly Volunteer Fire Department 204 Fifth Street Beverly, OH 45715

Ohio Environmental Protection Agency Attn: Mr. Dean Ponchak 2195 Front Street Logan, OH 43138 American Electric Power Muskingum River Plant Rt 2 Box 310 Waterford, OH 45786 9636

> AFE AMERICAN® ELECTRIC POWER

April 12, 2000

U.S. EPA Region V
Office of CEPP Chemical Preparedness
77 West Jackson Blvd.
Chicago, Illinois 60604

Attention: William Sandstrom?

Muskingum River Plant
Waterford, Morgan Washington Counties, Ohio
CR-ERNS Number Units 1-4 522755 - Unit 5 - 522754
Initial Continuous Release Written Notification

Dear Sir or Madam:

Enclosed please find an initial written continuous release report for American Electric Power's (AEP) Muskingum River Plant. This report is being submitted in accordance with 40 CFR and 302.8 to supplement the initial telephone notification made to the National Response Center (NRC), the State Emergency Response Commission (SERC) and the Local Emergency Planning Commission (LEPC) on March 13, 2000. As noted below, these reports contain information about the emissions associated with normal operations at our plant, and are not anticipated to result in any adverse impacts within Ohio or in any adjacent State.

This report was prompted by the issuance of an interim guidance document by the Environmental Protection Agency on December 21, 1999, giving notice of specific interpretations of the definition of a "federally permitted release" under Section 101 (10) (H) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). The interim guidance asserts that most permit limitations and control requirements established under the Clean Air Act do not qualify as "federally permitted releases," even though such emissions are part of the normal operation of these air emission sources and are directly or indirectly controlled by those permits and regulations. AEP does not agree with the positions announced in the interim guidance, and has submitted comments to EPA as requested in the notice. However, the enclosed report is based on the interpretations announced in the interim guidance.

a track

Please note that the emissions reported in the enclosed report represent a range of the levels at which individual hazardous constituents that may be present in the emissions associated with the normal operations of the major sources at our power plant. They do not represent "emergency" conditions, pose threats to public health or welfare, or require specific emergency response or planning activities. Actual emissions will vary with hours of operation, fuel quality, and other factors.

If you have any questions concerning the enclosed report, please contact James D. Ludwig of my staff at (740) 984-3468.

Sincerely yours,

Tracy A. Elyil
Tracy A. Elich

Business Manager

TAE:JDL:jlp-contrelease

cc:

SERC
Ohio EPA
122 South Front St.
Columbus, OH 43215

Barbara Hemeger Washington County EMA Director 205 Putnam Street Marietta, OH 45750

Julie Gridley
Morgan County EMA Director
P. O. Box 388 - 37E Main St.
McConnelsville, OH 43756

APR 17 2000

APR 17 2000

Office of Chemical Emergency Preparedness and Prevention

SECTION	I: GENERAL INFORMATION	CR-ERNS Number: 522755 and 522754
		Date of Initial Call to NRC: 03/13/00
	P port: Indicate below the type of report First Anniversar Follow-up Report	·
quantity and r	ate under the definitions in 40 CFR 302.8(urrent to the best of my knowledge.	ostances releases described herein are continuous and stable in a) or 355.4(a)(2)(iii) and that all submitted information is an Kohler, Plant Manager
<u>4</u>)1	2/00 Date	Name and Position M. Hudenic for DJ KOHLER Signature
Part A. Fac	ility or Vessel Information	
Name of Fac	ility or Vessel Muskingum Rive	r Unit Nos. 1, 2, 3 and 4; and or Unit No. 5
Person in Charge of Facility or Vessel	Name of Person in Charge Dan Koh Position Plant Manager Telephone No. (740) 984-3450	ler Alternate Telephone No. ()
Facility Address or Vessel Port of Registration	Street Rural Route No. 2 - Box	
O	dstreet Number for Facility	63765341
Facility/Vess-Location		
Part B. Pop	ulation Information	
Population Density	(Indicate by placing an "X" in the appropriate 0 - 50 persons	ation density within a one-mile radius of your facility or vessel iate blank below) 101 - 500 persons more than 1000 persons 501 - 1000 persons
Sensitive Populations	Sensitive Populations or Ec (e.g., schools, hospitals, wetlands, wild	
and Ecosystems Within One Mile Radius	State listed endangered and threatened species	Less than one mile at multiple locations

SECTION II: SOURCE INFORMATION

CR-ERNS Number:

522755

and

522754

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

. Indicate whether the release	from this source is either:	
continuous without interrupti	ionOR routine, anticipate	ed, intermittent X
If malfunction, describe the continuous and stable in qua	,	e malfunction should be considered
The releases associated with for production of electricity.	this source result from the combustion of fossil fu	els to produce steam energy
	identified substances include periods of startup and	al engulatoru evonence but
meet the requirements for in reference into 40 CFR Part 3	defined as malfunctions under other state and federal iclusion in 40 CFR Part 302.8 Continuous Releases 355 Emergency Planning and Notification.	, and as incorporated by
meet the requirements for in reference into 40 CFR Part 3	iclusion in 40 CFR Part 302.8 Continuous Releases	, and as incorporated by
meet the requirements for in reference into 40 CFR Part 3	iclusion in 40 CFR Part 302.8 Continuous Releases 355 Emergency Planning and Notification.	, and as incorporated by
meet the requirements for in reference into 40 CFR Part 3	tablished the pattern of release and calculated rel X Knowledge of the facility/vessel's	ease estimates.

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522**7**55 522**7**54

and

		
Nat	me of Source: Muskingum River Sta	ck CS014
Part	B: Specific Information on the Source	
	he source identified above, provide the folk for EACH source. Photocopy this page if	owing information. Please provide a SEPARATE necessary.
affecte wastep	d by the release from this source. If your source rele	ium (i.e., air, surface water, soil, or ground water) that is asses hazardous substances to more than one medium (e.g., a se to EACH medium as a separate source and complete dium affected.
1 -	IR X (stack _X _ or area) If the medicurce is a stack or a ground-based area source.	um affected is air, please also specify whether the
,	If identified source is a stack, indicate stack heig	ht: 828 feet ox xuesteus xOR
,	If identified source is an area source (e.g., waste emissions), indicate surface area: square if	pile, landfill, valves, tank vents, pump seals, fugitive feet or square meters.
Ø S	URFACE WATER (stream, lake	_ , or other)
,	If the release affects any surface water body, gi	ve the name of the water body.
,	If the release affects a stream, give the stream or stream order: or average flow rate:	der or average flow rate, in cubic feet per second.
		of the lake in acres and the average depth in meters.
	surface area of lake: acres and average de	
	DIL OR GROUND WATER e release is on or under ground, indicate the distance	to the closest water well.
	Optional In	formation
e r	The following information is not required in the final evaluating the risks associated with the continuous remake conservative assumptions about the appropriate suggested units. You may use other units; however	lease. If this information is not provided, EPA will riate values. Please note that the units specified below
	For a stack release to air, provide the following information, if available: Inside diameter feet or meters Gas Exit Velocity feet/second or meters/second	For a release to surface water, provide the following information, if available: Average Velocity feet/second of Surface Water
	Gas Temperature degrees Fahrenheit	

Kelvin, or Celsius

SECTION II: SOURCE INFORMATION

(continued)

CR-ERNS Number:

and 522755

522754

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Muskingum River Stack CS014

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances · A Guide for Facilities and Vessels on Compliance.)

		Norma	Normal Range	Number of Days	Total Quantity	
		(in lbs. oxx	(in lbs. orskgeper day)*	Release Occurs	Released in Previous Year	Months of the
Name of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in lbs. conkers*	Release
Nitrogen oxide	10102439	412,216	194,207	365	18,400,000	1.2
Nitrogen dioxide	10102440	21,696	10,221	365	000,006	12
Hydrochloric acidV	7647010	20,273	9,015	365	2,600,000	12
Hydrogen fluorideV	7664393	1,360	605	365	260,000	12
Sulfuric acid	7664939	7,442	3,013	365	1,500,000	12
Mercury	7439976	1.1	0.5	365	281	12
Selenium dioxide	7446084	26.5	11.8	365	5,500	12
Calcium arsenate 🖍	7778441	7.4	2.7	365	430	1.2
Cyanides /	57125	21.4	10.2	365	2,500	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances · A Guide for Facilities and Vessels on Compliance.)

		Months	of the	Release
() ()	total Quantity of	. Mixture Released	Occurs in Previous Year	(in 1bs, or kg)
	Number of	Days Release	Occurs	(per year)
Notified Kange of	Mixture	(in lbs. or ke per day)*	Upper Lower	Bound Bound
Normal Kange of	Components	(in lbs. or kg per day)*	Weight Upper Lower	Percentage Bound Bound
	Name of	Hazardous	Substance	Components CASRN#
				Name of Mixture

^{*} Pleuse he sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (C1) are appropriate.

SECTION II: SOURCE **INFORMATION**

CR-ERNS Number:

522755

and 522754

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if

Name of Source:	Muskingum River Stack 5	
. Indicate whether the release	from this source is either:	
continuous without interrupti	onOR routine, anticipate	od, intermittent X
If malfunction, describe the continuous and stable in qua	this source result from the combustion of foscilla	e malfunction should be considered to the considered for the considere
circumstances that may be d	identified substances include periods of startup and effined as malfunctions under other state and federal clusion in 40 CFR Part 302.8 Continuous Releases 355 Emergency Planning and Notification.	al regulatory programs but
3. Identify below how you est	ablished the pattern of release and calculated rele	ease estimates.
X Past release data	X Knowledge of the facility/vessel's operations and release history	X Engineering estimate
	u.	
X AP-42	X Best professional judgment	Other (explain)
<u>X</u> AP-42	X Best professional judgment	Other (explain)

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents. do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522755 522754 and

Name of Source: Muskingum River Stack S	5			
Part B: Specific Information on the Source				
For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.				
AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.				
AIR _x (stack _x or area) If the media source is a stack or a ground-based area source.	am affected is air, please also specify whether the			
। If identified source is a stack, indicate stack height: <u>828</u> feet সংসাহরেন্ড; OR				
If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.				
SURFACE WATER (stream, lake, or other)				
If the release affects any surface water body, give the name of the water body.				
If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate; cubic feet/second; OR				
If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.				
surface area of lake: acres and average depth of lake: meters.				
SOIL OR GROUND WATER				
If the release is on or under ground, indicate the distance to the closest water well.				
Optional Information				
The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.				
For a stack release to air, provide the following information, if available: Inside diameter feet or meters Gas Exit Velocity feet/second or	For a release to surface water, provide the following information, if available: Average Velocity feet/second of Surface Water			

meters/second

Kelvin, or Celsius

Gas Temperature ______ degrees Fahrenheit,

SECTION II: SOURCE INFORMATION

(continued)

CR-ERNS Number: 522754

and

522755

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Musi

e: Muskingum River Stack 5

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

		Norma (in lbs. ※x★	Normal Range (in lbs. 宛 zkg per day)*	Number of Days Release Occurs	Total Quantity Released in Previous Year	Months of the
Name of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in Ibs. wrka *	Release
Nitrogen oxide	10102439	290,990	126,507	365	23,300,000	12
Nitrogen dioxide	16102440	6,658	3,775	365	1,200,000	12
Hydrochloric acid	7647010	13,526	6,692	365	3,200,000	12
Hydrogen fluoride	7664393	907	449	365	160,000	12
Sulfuric acid	7664939	957	361	365	140,000	12
Selenium dioxide	7446084	17.7	8.7	365	3,500	12
Calcium arsenate	7778441	8.6		365	280	12
Cyanides	57125	12.7	8.3	365	3,700	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances · A Guide for Facilities and Vessels on Compliance.)

		Months	of the	Release
J	JOINT CHARLITY OF	Mixture Released	in Previous Year	(in lbs. or kg)
	Number of	Days Release	Occurs ir	(Dec Year)
POINT RANGE OF	Mixture		Upper Lower	
Normal Kange of	Components		Upper Lower	
		ij	Weight	Percentage
				CASRN#
	Name of	Hazardons	Substance	Components
				Name of Mixture

^{*} Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

CR-ERNS Number:

522755

522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen oxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs. kgx ex (20))

Muskingum River Stack CS014

412,216

Muskingum River Stack 5

590,990

TOTAL - SSI trigger for this hazardous substance release*: 1,029,206 lbs.

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgx&x (Si))

Muskingum River Stack CS014

21,696

Muskingum River Stack 5

6,658

TOTAL - SSI trigger for this hazardous substance release*: 28,354 lbs.

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrochloric acid

Km = 5000

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs. **kgcox&i*)

Muskingum River Stack CS014

20,273

Muskingum River Stack 5

13,526

TOTAL - SSI trigger for this hazardous substance release*: 33,799 lbs.

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

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and

Number: 522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrogen fluoride

A Q CIES

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kg.xxx.(ii)

Muskingum River Stack CS014

1,360

Muskingum River Stack 5

907

TOTAL - SSI trigger for this hazardous substance release*: 2,267 lbs.

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754 and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Sulfuric acid

GR = 100

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kexer/Gi)

Muskingum River Stack CS014

7,442

Muskingum River Stack 5

957

TOTAL - SSI trigger for this hazardous substance release*: 8,399 1bs

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754 and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Mex	cury Raci
identified above, aggregate the upper bounds of the sources identified in Section II, Part C. If the hazar	f the normal range of a release) for the hazardous substance normal range of the identified hazardous substance across all dous substance is also a component of a mixture, be certain to lated in Section II, Part C, in your calculation of the SSI trigger.
Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg.vor.Ci)
Muskingum River Stack CS014	1.1
TOTAL - SSI trigger for this hazardous	substance release*:

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

selenium dioxide

Berio

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., keror Gi)

Muskingum River Stack CS014

26.5

Muskingum River Stack 5

17.7

TOTAL - SSI trigger for this hazardous substance release*: 44.2 lbs.

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

calcium arsenate

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgcxorx&x)

Muskingum River Stack CS014

7.4

Muskingum River Stack 5

8.6

TOTAL - SSI trigger for this hazardous substance release*: ____16.0 lbs.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

cyanides



To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs...kexxxxxii)

Muskingum River Stack CS014

21.4

Muskingum River Stack 5

12.7

TOTAL - SSI trigger for this hazardous substance release*: 34.1 lbs.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

SECTION	I: GENERAL CR-ERNS Number: 522754		
	Date of Initial Call to NRC: 03/13/00		
Type of Report: Indicate below the type of report you are submitting. First Anniversary Written Notification Written Notification of a Change to Follow-up of a Change to Report Initial Notification Follow-up Report			
Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge. Dan Kohler, Plant Menager Name and Position			
<u> 4/</u> 1	2/00 M Studenia for DJ KOHLER Signature		
Part A. Fac	ility or Vessel Information		
Name of Fac	Huskingum River Unit Nos. 1, 2, 3 and 4; and Muskingum River Unit No. 5		
Person in Charge of Facility or Vessel	Name of Person in Charge Dan Kohler Position Plant Manager Telephone No. (740) 984-3450 Alternate Telephone No. ()		
Facility Address or Vessel Port of Registration Address or Vessel Registration Address or Vessel Port of Registration			
-	dstreet Number for Facility 063765341		
Facility/Vessel Latitude Deg 039 Min 35 Sec 26 Vessel LORAN Coordinates Location Longitude Deg 081 Min 40 Sec 45			
Part B. Population Information			
Population Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below). 0 - 50 persons 101 - 500 persons more than 1000 persons 51 100 persons 501 - 1000 persons			
Sensitive Populations	Sensitive Populations or Ecosystems (e.g., schools, hospitals, wetlands, wildlife preserves, etc.) Distance and direction from facility		
and Ecosystems Within One Mile Radius	State listed andangered and threatened species in the Muskingum River which borders on the north and east plant site boundaries.		

SECTION II:	SOURCE
	INFORMATION

CR-ERNS Number: 522754

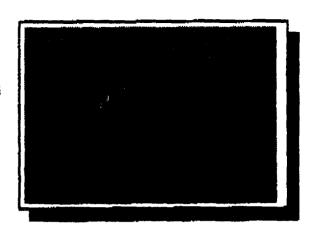
Part A: Basis for Asserting the Release Is Continuous and Stable in Quantity and Rate.

Name of Source:	Muskingum River Stack CS014
1. Indicate whether the rele	se from this source is either:
continuous without interre	otion OR routine, anticipated, intermittent X
	hat results in the release from this source (e.g., batch process, filling of a storage tank) is malfunction and explain why the release from the malfunction should be considered transity and rate.*
The releases assoc	sted with this source result from the combustion of
	produce steam energy for production of electricity.
Calculations for releases circumstances that may be meet the requirements for	
Calculations for releases circumstances that may be meet the requirements for	produce steam energy for production of electricity. I identified substances include periods of starrup and shutdown and certain defined as malfunctions under other state and federal regulatory programs but inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by
Calculations for releases circumstances that may be meet the requirements for	produce steam energy for production of electricity. I identified substances include periods of starrup and shutdown and certain defined as malfunctions under other state and federal regulatory programs but inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by
Calculations for releases circumstances that may be meet the requirements for	produce steam energy for production of electricity. I identified substances include periods of starrup and shutdown and certain defined as malfunctions under other state and federal regulatory programs but inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by
Calculations for releases circumstances that may be meet the requirements for reference into 40 CFR Pr	produce steam energy for production of electricity. I identified substances include periods of starrup and shutdown and certain defined as malfunctions under other state and federal regulatory programs but inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by
Calculations for releases circumstances that may be meet the requirements for reference into 40 CFR Pr	produce steam energy for production of electricity. If identified substances include periods of startup and shutdown and certain defined as malfunctions under other state and federal regulatory programs but inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by t 355 Emergency Flanning and Notification.

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents. do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

Muskingum River Plant

Box 310 - Route #2 Weterferd, Shie 45788



To:_	William Sandstrom			
Çem	MANY USERA Ragion	Z.		
far:	(312) 886-6064			
fren	James Juding			
	<u> </u>	_	al dille	فرمد المتعدد
\$ub)	1981: Initial Continuora	Release	(Revisal)	tend make
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NATIONAL RESPONSE CENTER (NRC) ***GOVERNMENT USE ONLY***GOVERNMENT USE ONLY***

IRIS/NRC # 522754 - ONS WE (C C & CR N S



INCIDENT DESCRIPTION

*Report taken by: CIV REDDY at 09:00 on 13-MAR-00

Incident Type: CONTINUOUS

Incident Cause: OTHER Affected Area:

The incident occurred on 13-MAR-00 at 09:03

local time.

REPORTING

PARTY

Name: GUY CERIMELE Organization: AMERICAN ELECTRIC POWER Address: 1 RIVERSIDE PLAZA COLUMBUS, OH 43215

AMERICAN ELECTRIC POWER called for the responsible party.

PRIMARY Phone: (614)2231295

Type of Organization:

PUBLIC UTILITY

SUSPECTED

RESPONSIBLE PARTY

Name: DAN KOHLER Organization: AMERICAN ELECTRIC POWER Address: RURAL

ROUTE NO.2

WATERFORD, OH 45786

PRIMARY Phone: (740)9843450

Type of Organization: PUBLIC UTILITY

INCIDENT

LOCATION

RURAL ROUTE NO.2 County: WASHINGTON WATERFORD, OH

RELEASED

MATERIAL(S)

SOURCE/CAUSE OF

INCIDENT

INITAL / CALELR HAD NO AMOUNT FOR UPPER BOUNDS

REMEDIAL ACTIONS

NOTIFICATIONS

BY NRC

ADDITIONAL INFORMATION

CHRIS Code: CCA Official Material

Name: CALCIUM ARSENATE

Also Known As:

Upper Bounds: UNKNOWN

AMOUNT/UNKNOWN

CHRIS Code: HCL Official Material Name: HYDROCHLORIC

ACID

Also Known As:

Upper Bounds: UNKNOWN

AMOUNT/UNKNOWN

NOTIFICATIONS BY NRC

CHRIS Code: HFA Official Material Name: HYDROFLUORIC ACID

Also Known As:

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: CYANIDE

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: NITROGEN DIOXIDE

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: NITROGEN OXIDE

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: SLD Official Material Name: SELENIUM DIOXIDE

Also Known As:

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

*** END INCIDENT REPORT # 522754 ***

Report any problems or Fax number changes by calling 1-800-424-8802

PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil

NATIONAL RESPONSE CENTER (NRC)
GOVERNMENT USE ONLY

IRIS/NRC # 522755 - Contine w/522754

INCIDENT DESCRIPTION

*Report taken by: CIV REDDY at 09:09 on 13-MAR-00

Incident Type: CONTINUOUS

Incident Cause: OTHER Affected Area:

The incident occurred on 13-MAR-00 at 09:13

local time.

REPORTING

PARTY

Name: GUY CERIMELE Organization: AMERICAN

ELECTRIC POWER

Address: 1 RIVERSIDE

PLAZA

COLUMBUS, OH 43215

AMERICAN ELECTRIC POWER called for the responsible party.

PRIMARY Phone: (614)2231295

Type of Organization:

PUBLIC UTILITY

SUSPECTED

RESPONSIBLE PARTY

Name: DAN KOHLER

Organization: AMERICAN

ELECTRIC POWER

Address: RURAL ROUTE

NO.2 > POB 310

WATERFORD, OH 45786

PRIMARY Phone: (740)9843450

Type of Organization: PUBLIC UTILITY

INCIDENT

LOCATION

RURAL ROUTE NO.2 County: MORGAN WATERFORD, OH

RELEASED

MATERIAL(S)

SOURCE/CAUSE OF

INCIDENT

INITIAL / CALLER HAD NO ANOUNT FOR UPPER BOUNDS **DAMAGES**

REMEDIAL

ACTIONS

NOTIFICATIONS

BY NRC

ADDITIONAL

INFORMATION

CONTINUOUS RELEASE

MATERIAL

CHRIS Code: CCA

Official Material Name:

CALCIUM ARSENATE

Also Known As:

Upper Bounds: UNKNOWN

AMOUNT/UNKNOWN

CHRIS Code: HCL

Official Material Name:

HYDROCHLORIC ACID

Also Known As:

Upper Bounds: UNKNOWN

AMOUNT/UNKNOWN

NOTIFICATIONS BY NRC

CHRIS Code: HFA Official Material Name: HYDROFLUORIC ACID

Also Known As:

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: MCR Official Material Name: MERCURY

Also Known As:

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: CYANIDE

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: NITROGEN DIOXIDE

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: NITROGEN OXIDE

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: SFA Official Material Name: SULFURIC ACID

Also Known As:

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

CHRIS Code: SLD Official Material Name: SELENIUM DIOXIDE

Also Known As:

Upper Bounds: UNKNOWN AMOUNT/UNKNOWN

*** END INCIDENT REPORT # 522755 ***

Report any problems or Fax number changes by calling 1-800-424-8802

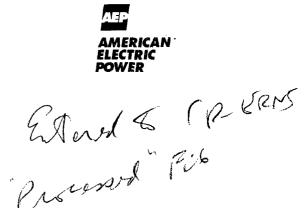
PLEASE VISIT OUR WEB SITE AT http://www.nrc.uscg.mil

American Electric Power

1 Riverside Piaza Columnus, CH 43215 2373 614 223 1000







May 11, 2001

U.S. EPA Region V Office of CEPP Chemical Preparedness 77 West Jackson Blvd. Chicago, IL 60604

Re:

American Electric Power

Annual Follow-up Continuous Release Notification

Dear Sir or Madam:

Please find enclosed first anniversary follow-up reports on continuous release notifications for the following facilities:

Facility Name	CR-ERNS Number	Facility Location
Big Sandy Plant	522751 /	Louisa, KY 41230
Cardinal Plant	522824, 5 2 2825 & 522827	Brilliant, OH 43913
Conesville Plant	522818, 5 22820, 522822 & 522823	Conesville, OH 43811
Gavin Plant	522747 & 522748	Cheshire, OH 45620
Kammer Plant	522800/	Moundsville, WV 26041
Mitchell Plant	522794/	Moundsville, WV 26041
Mountaineer Plant	522753	New Haven, WV 25265
Muskingum River Plant	322754 & 522755 Vedurang	Waterford, OH 45786
Picway Plant	522789	Lockbourne, OH 43137
Rockport Plant	522778	Rockport, IN 47635
Philip Sporn Plant	522816 & 522817	New Haven, WV 25265

These reports are being submitted in accordance with 40 CFR §302.8 to follow up initial written notifications made in May 2000. These reports were prompted by the issuance of an interim guidance document by the Environmental Protection Agency on December 21, 1999 giving notice of specific interpretations of the definition of a "federally permitted release" under Section 101 (10)(H) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). AEP does not agree with the positions announced in the guidance and has participated in the review and evaluation of the initial guidance and subsequent guidance documents. However, the enclosed reports are based on the interpretations announced in the interim guidance.

Please note that the emissions reported in the enclosed reports represent a range of levels at which individual hazardous constituents may be present in the emissions associated with the normal operations of the major sources at our power plants. They do not represent "emergency" conditions, pose threats to public health or welfare or require specific emergency response or planning activities. Actual emissions will vary with hours of operation, fuel quality and other factors.

If you have any questions concerning the enclosed reports, please contact me at (614) 223-1246.

Sincerely,

Thomas R. Zelina

Thomas & Elica

Manager, Waste Management and Mediation Services

SECTION	I: GENERAL INFORMATION	CR-ERNS	Number: 522755 and 522754	-
		Date of Initi	ial Call to NRC: 03/13/00	
Type of Report: Indicate below the type of report you are submitting. First Anniversary Written Notification Written Notification of a Change to Follow-up Report Initial Notification Follow-up Report				
Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge. Dan Kohler, Plant Manager Name and Position				
Part A. Fac	ility or Vessel Information			
Name of Facility or Vessel Muskingum River Unit Nos. 1, 2, 3 and 4; and Muskingum River Unit No. 5				
Person in Charge of Facility or Vessel	Name of Person in Charge Dan Koh Position Plant Manager Telephone No. (740) 984-3450		elephone No. ()	
Facility Address or Vessel Port of Registration	Street Rural Route No. 2 - Box City Waterford		County Morgan and Washingt State OH Zip Code 45786	on
Ŭ	dstreet Number for Facility 0	63765341		
Facility/Vessel Latitude Deg 039 Min 35 Sec 26 Vessel LORAN Coordinates Location Deg 081 Min 40 Sec 46				
Part B. Population Information				
Population Density Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below). 0 - 50 persons 101 - 500 persons more than 1000 persons 51 - 100 persons 501 - 1000 persons				
Sensitive Populations	Sensitive Populations or Eco (e.g., schools, hospitals, wetlands, wild	-	Distance and direction from faci	ility
and Ecosystems Within One Mile Radius	State listed endangered and threatened species		Less than one mile at multiple locations	

SECTION II: SOURCE INFORMATION

CR-ERNS Number:

522755 522754

and

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Muskingum River Stack CS014	
1. Indicate whether the release from this source is either:	
continuous without interruption OR routine, anticipate	ed, intermittent X
 Identify the activity(ies) that results in the release from this source (e.g., bat If malfunction, describe the malfunction and explain why the release from th continuous and stable in quantity and rate.* 	tch process, filling of a storage tank ne malfunction should be considered
The releases associated with this source result from the combustion of fossil for production of electricity.	uels to produce steam energy
Calculations for releases of identified substances include periods of startup and circumstances that may be defined as malfunctions under other state and feder meet the requirements for inclusion in 40 CFR Part 302.8 Continuous Releases reference into 40 CFR Part 355 Emergency Planning and Notification.	al regulatory programs but
3. Identify below how you established the pattern of release and calculated re-	lease estimates.
X Past release data X Knowledge of the facility/vessel's operations and release history	X Engineering estimate
X AP-42 X Best professional judgment	Other (explain)

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522755 522754 and

Name of Source:

Muskingum River Stack CS014

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

	IR \underline{x} (stack \underline{x} or area \underline{x}) If the medium affected is air, please also specify whether the curce is a stack or a ground-based area source.
	If identified source is a stack, indicate stack height: 828 feet or xxxxxxXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
,	If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.
<u></u> ∂ s	URFACE WATER (stream, lake, or other)
,	If the release affects any surface water body, give the name of the water body.
2	If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR
1	If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: acres and average depth of lake: meters.
	OIL OR GROUND WATER e release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following
information, if available:
Inside diameter feet or meters
Gas Exit Velocity feet/second or
meters/second
Gas Temperature degrees Fahrenheit,
Kelvin or Celsius

For a release to surface	e water, provide the
following information	i, if available:
Average Velocity	feet/second

of Surface Water

_ feet/second

SECTION II: SOURCE INFORMATION

(continued)

CR-ERNS Number:

522755 and 522754

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Muskingum River Stack CS014

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

		Norma	Normal Range	Number of Days	Total Quantity	Months of the
		Service (in los. oxx	(in los. oraegaper day)"	Release Occurs	Released in Previous Year Infolius of the	MOINIS OF THE
Name of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in lbs. oakay)*	Release
Nitrogen oxide	10102439	430,062	194,207	365	30,012,000 -15006 12	00% 12
Nitrogen dioxide	10102440	22,635	10,221	365	1,600,000) (MS 12
Hydrochloric acid	7647010	21,150	9,015	365	2,400,000	12
Hydrogen fluoride	7664393	1,418	605	365	268,000	12
Sulfuric acid	7664939	7,826	3,013	365	1,314,000	12
Mercury	7439976	1.2	0.5	365	349	12
Selenium dioxide	7446084	39.0	11.8	365	7,820	12
Calcium arsenate	7778441	10.5	2.7	365	988	12
Cyanides	57125	25.1	10.2	365	4,902	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

	Afontho	MOUNTS	or the	Release
Total Quantity of	Minter Delegad	e iviixiure Keleaseu	in Previous Year	(in lbs. or kg)
	Number of	Days Releas	Occurs	(per year)
Normal Range of	Mixture	(in lbs. or kg per day)*	Upper Lower	Bound Bound
Normal Range of	Components	(in lbs. or kg per day)*	Weight Upper Lower	Percentage Bound Bound
				CASRN#
•	Name of	Hazardous	Substance	Components
	-	-	,	Name of Mixture

^{*} Pleuse be sure to include units where appropriate. Also, if the releuse is a radionuclide, units of curies (CI) are appropriate.

SECTION II: SOURCE INFORMATION

CR-ERNS Number:

522755

and 522754

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if

Name of Source:	Muskingum River Stack 5	
. Indicate whether the release	e from this source is either:	
continuous without interrupt	ionOR routine, anticipate	ed, intermittent X
	nt results in the release from this source (e.g., bat malfunction and explain why the release from th antity and rate.*	•
The releases associated with for production of electricity	n this source result from the combustion of fossil fu	uels to produce steam energy
circumstances that may be meet the requirements for in	identified substances include periods of startup and defined as malfunctions under other state and feder iclusion in 40 CFR Part 302.8 Continuous Releases 355 Emergency Planning and Notification.	al regulatory programs but
3. Identify below how you es	tablished the pattern of release and calculated rel	ease estimates.
X Past release data	X Knowledge of the facility/vessel's operations and release history	X Engineering estimate
<u>X</u> AP-42	X Best professional judgment	Other (explain)
÷		
	•	•
	•	

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents. do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

522755 522754

and

Name of Source: Muskingum River Stack 5

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II. Parts A. B. and C. of this format for EACH medium affected.

	IR x (stack x or area) If the medium affected is air, please also specify whether the ource is a stack or a ground-based area source.
	If identified source is a stack, indicate stack height: 828 feet or meters; OR
	If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.
) 5	URFACE WATER (stream, lake, or other)
	If the release affects any surface water body, give the name of the water body.
	If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the followinformation, if available:				
Inside diameter	feet or meters			
Gas Exit Velocity	feet/second or			
	meters/second			
Gas Temperature	degrees Fahrenheit.			
·	Kelvin, or Celsius			

For a release to surface water, provide the following information, if available:

Average Velocity _____ feet/second of Surface Water

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 522754 and

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Name of Source: Muskingum River Stack 5

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

		Norma	Normal Range	Number of Days	Total Quantity		
		(in Ibs. ⊗ ⊈#	(in lbs. 桑底林島 per day)*	Release Occurs	Released in Previous Year Months of the	Months of the	
Name of Hazardous Substance	CASRN#	Upper Bound	Lower Bound	(per year)	(in Ibs. 20x kg **	Release	
Nitrogen oxide	10102439	127,717	126,507	365		11 709,312	
Nitrogen dioxide	10102440	6,722	3,775	365	1,200,000	12	
Hydrochloric acid	7647010	13,655	6,692	365	3,400,000	. 12	
Hydrogen fluoride	7664393	916	449	365	221,000	12	
Sulfuric acid	7664939	1,053	361	365	144,000	12	
Selenium dioxide	7446084	25.1	8.7	365	6,630	12	
Calcium arsenate	7778441	11.5	2.2	365	728	12	
Cyanides	57125	14.1	8.3	365	3,902	12	
Mercury	7439976	0.7	0.3	365	153	12	

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

		Months	of the	Release
	lotal Quantity of	Mixture Released	in Previous Year	(in lbs. or kg)
	Number of	Days Release	Occurs	· (per year) (i
Normal Kange of	Mixture	(in lbs. or kg per day)*	Upper Lower	Bound Bound
Normal Kange of	Components	in lbs. or kg per day)*	Upper Lower	Bound Bound
		<u> </u>		Percentage
				CASRN#
	Name of	Hazardous	Substance	Components
٠				Name of Mixture

^{*} Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

CR-ERNS Number:

522755 522754 and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen oxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgx 805 Civ)

Muskingum River Stack CS014

430,062

Muskingum River Stack 5

127,717

TOTAL - SSI trigger for this hazardous substance release*: ___557,779

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgx 80x 563)

Muskingum River Stack CS014

22,635

Muskingum River Stack 5

6,722

TOTAL - SSI trigger for this hazardous substance release*:

29,357

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrochloric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of

Muskingum River Stack CS014

21,150

Muskingum River Stack 5

13,655

TOTAL - SSI trigger for this hazardous substance release*: 34,805

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrogen fluoride

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kg:)

Muskingum River Stack CS014

1,418

Muskingum River Stack 5

916

TOTAL - SSI trigger for this hazardous substance release*: ____2,334

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Sulfuric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgx pr. (Six)

Muskingum River Stack CS014

7,826

Muskingum River Stack 5

1,053

TOTAL - SSI trigger for this hazardous substance release*:

8.879

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755

and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Mercury

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kgxxx Gi)

Muskingum River Stack CS014

1.2

Muskingum River Stack 5

0 7

TOTAL - SSI trigger for this hazardous substance release*: 1.9

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

selenium dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Rangé of the Release (specify lbs., key or (Si))

Muskingum River Stack CS014

39.0

Muskingum River Stack 5

25.1

TOTAL - SSI trigger for this hazardous substance release*: 64.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number:

522755 and

522754

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

calcium arsenate

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs...*kgx×or**&*)

Muskingum River Stack CS014

10.5

Muskingum River Stack 5

11.5

TOTAL - SSI trigger for this hazardous substance release*: 22.0

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

CR-ERNS Number: 522754

and

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

cyanides

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., skexorx&ix)

Muskingum River Stack CS014

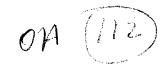
25.1

Muskingum River Stack 5

14.1

TOTAL - SSI trigger for this hazardous substance release*:

^{*} This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.





A unit of American Electric Power

AEP Ohio

Muskingum River Plant 1501 Sparling Road Waterford, OH 45786-6104 AFPOhio com

CERTIFIED MAIL Return Receipt Requested

March 4, 2009

U. S. EPA Region V
Office of CEEP Chemical Preparedness
77 West Jackson Boulevard
Chicago, Illinois 60604

Received

MAR 1 8 2009

Subject:

First Anniversary Follow-up Report -

Muskingum River Plant

Chemical Caregopacy

Dear Mr. Sandstrom:

This letter is submitted as the First Anniversary Follow-up Report to the notification made on February 7, 2008 at 3:25 p.m. EST, by Mr. Joseph Campbell of Ohio Power Company, who, at that time notified the National Response Center (NRC) of a change in the normal range of continuous release of Sulfuric Acid, a reportable substance, from our Muskingum River Plant (CR-ERNS #522755 and #522754). The February 7, 2008 notification of change revised the normal range of emissions for Sulfuric Acid (CASRN # 7664939) from Unit 5 of the Muskingum River Plant. The range was revised to be from 2,097 to 17,799 pounds per 24-hour period for Unit 5. A written report was submitted on March 5, 2008.

These sulfuric acid emissions are routine in nature, anticipated, intermittent and incidental to the normal operation of the facility. Based upon these characteristics, these emissions are eligible for continuous release reporting. Actual releases will vary with seasonal operation of the equipment, actual hours of operation, fuel quality and other factors, but the released quantity will remain within these newly established ranges.

This First Anniversary Follow-up Report is a release information update in which no changes are being made to the detailed information previously submitted. Therefore, we are only revising the signed Section I to indicate the type of report.

Please find enclosed an original signed "First Anniversary Follow-up Report" (Section I) for Muskingum River Plant. Copies of the previously submitted Section II, (Source Information) for each emissions unit and Section III, calculation of the SSI (Upper Bound) for each reported substance are attached for your information.

If you have any questions concerning this notice, please do not hesitate to contact James D. Ludwig by telephone at (740) 984-3468 or by e-mail at jdludwig@aep.com.

Sincerely,

David D. Wickline General Plant Manager Muskingum River Plant

Enclosure

Ned

SECTION	I: GENERAL INFORMATION	CR-ERNS Number: 522755 and 522754			
Date of I	nitial Release;	Date of Initial Call to NRC: 03/13/00			
	eport: Indicate below the type of report y First Anniversary Viitten Notification Keport Report				
Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302 8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge David Wickline, Plant Manager Name and Position Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302 8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge David Wickline, Plant Manager					
	Date	Signature			
Part A. Facility or Vessel Information					
Name of Facility or Vessel Muskingum River Unit Nos. 1,2,3, and 4; and Muskingum River Unit No. 5 Person Name of Person in Charge David Wickline					
Person in Charge	ckline				
of Facility or Vessel					
Facility	Alternate Telephone No. ()				
Address or Street Rural Route No. 2 - Box 31		County Morgan & Washington			
Vessel Port of	City Waterford	State OH Zip Code 45786			
Registration					
Dun and Bradstreet Number for Facility 063765341 Facility/Vessel Latitude Deg 039 Min 35 Sec 25 Vessel LORAN Coordinates					
Location	Longitude Deg 039 Min 3 Longitude Deg 081 Min 4				
Part B. Population Information					
Population Density	Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).				
Sensitive Populations and	systems Distance and direction from facility life preserves, etc.)				
Ecosystems Within One Mile Radius	State Listed endangered and threatened s	species Less than one mile at multiple locations			

cc w/att:

Ohio Environmental Protection Agency Attn: State Emergency Response Commission 122 South Front Street Columbus, OH 43215

LEPC Miranda Mullen Morgan Cnty. EMA Director 60 South Fourth St. McConnelsville, OH 43756

LEPC Jeff Lauer Washington Cnty. LEPC 205 Putnam St. Marietta, OH 45750

Beverly Volunteer Fire Department 204 Fifth Street Beverly, OH 45715

Ohio Environmental Protection Agency Attn: Mr. Dean Ponchak 2195 Front Street Logan, OH 43138